Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the matter of	)	
	)	
Carrier Current Systems, including Broadband over Power Line Systems	)	ET Docket 03-104
	)	
Amendment of Part 15 regarding new requirements and measurement guidelines for Access Broadband over Power Line Systems	)	ET Docket 04-37

COMMENTS OF REC NETWORKS

1. REC Networks ("REC") is a supporter of locally owned and diverse radio. REC currently operates several Internet only radio stations. REC also operates several websites including the original LPFM Channel Search Tool[1]. REC Networks also represents the interests of independently owned Low Power FM ("LPFM") broadcast stations and their listeners. REC also follows issues that involve the availability of media in rural and underserved areas.

2. REC continues to oppose the implementation of Access Broadband over Power Line (BPL) services as they would create interference to various services including Amateur, Fixed, Mobile and Radio Astronomy. In the previous proceeding, several Incumbent Local Exchange Carriers (ILEC) such as Qwest had commented that BPL at the lower frequencies could affect the xDSL disturber model and could impact the provision of DSL services when phone lines are on the same poles as the electric lines carrying BPL services. We concur with their findings.

3. REC feels that if BPL is implemented, that it is critical that frequency band are "notched" to protect licensed services. Bands that should be notched include those that are used frequently in residential and small business areas such as the Amateur Radio service as well as

[1] - http://www.recnet.com/lpfminfo

the domestic (AM) and international broadcast (shortwave) services. Services that require a very low noise floor, such as radio astronomy must also be protected.

4. The following chart shows frequency bands between 0.5-80 MHz, which in the opinion of REC, must be protected (or "notched") from Access BPL systems:

Frequency kHz	Application
500-505	Distress Calling
525-1715	Broadcast/TIS
1800-2000	Amateur
2173.5-2190.5	Distress Calling
2495-2505	Frequency Standard
3500-4000	Amateur
4750-4995	Broadcast
4995-5005	Frequency Standard
5005-5060	Broadcast
5332, 5348, 5368, 5373, 5405 (+/- 3kHz)	Amateur
5900-6200	Broadcast
7000-7300	Amateur
7300-7450	Broadcast
9400-9900	Broadcast
9995-10005	Frequency Standard
10100-10150	Amateur
11600-12100	Broadcast
13360-13410	Radio Astronomy
13570-13870	Broadcast
14000-14350	Amateur
14990-15010	Frequency Standard
15100-15800	Broadcast
17480-17900	Broadcast
18068-18168	Amateur
18900-19020	Broadcast
19990-20010	Frequency Standard
21000-21450	Amateur
21450-21850	Broadcast
24890-24990	Amateur
24990-25010	Frequency Standard
25670-26100	Broadcast
28000-29700	Amateur
37500-38250	Radio Astronomy
50000-54000	Amateur
54000-72000	Broadcast
74800-75200	Aeronautical Radionav.
76000-80000	Broadcast

Table 1: Frequency ranges that would need to be protected by Access BPL.

5. We also note that high frequency is used for disaster communications in the non-amateur fixed and mobile service. We are personally aware of the National Security Emergency Preparedness (NSEP) operations of various regional Bell Operating Companies, especially the one that serves California. These HF stations are located at various telephone company locations including central offices and maintenance garages. These stations are also authorized to operate portable from any location. REC is concerned that critical communications, such as those necessary in the first few hours following an earthquake can be severely impacted by an Access BPL system.

6. In the Notice at 43, the Commission seeks comments on a notification requirement similar to those for Power Line Carrier (PLC). REC feels that such a notification is necessary, but unlike the PLC database, must be made available to the general public through a disclosure process similar to a Network Disclosure that must be filed by ILECs about their facilities. This network disclosure must indicate the area served by the BPL system and a 24 hour live method of contact to report interference.

7. I have personally heard tape recordings of interference to the Amateur Radio Service by trial BPL operations. From the recordings that I have heard, BPL renders the Amateur Service useless in residential areas.

8. REC feels that Access BPL will create severe interference to licensed services. We feel that rural areas and other can obtain broadband services from wireless services such as the new 3650-3700 MHz wideband service being proposed in ET Docket 04-151 as well as using unused TV Channels. If the Commission is to allow Access BPL, we must assure that the Amateur and Broadcast services are protected. In addition, services that depend on the reception of weak signals and a low noise floor such as radio astronomy and distress calling must also be protected. As shown in the chart above, it does not leave much room in the prime HF spectrum for Access BPL. We feel that there are better alternatives for broadband than BPL.

Respectfully Submitted,

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